

Exhibit B

Consumer and Third-Party Payor Class Definitions

- a. All individuals and entities in the United States and its territories and possessions who, since at least January 1, 2012 through the date of final recall as of November 10, 2021, paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by any Defendant.

Third Party Payor Class

- a. A class of all Third-Party Payors that, from at least January 1, 2012 through the date of final recall as of November 10, 2021, paid any amount of money in the United States for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by any Active Pharmaceutical Ingredient, Finished Dose or Wholesaler Defendant.

TPP Breach of Express Warranties Subclasses

- a. A breach of express warranty subclass of all TPPs that, from at least January 1, 2012 through the date of final recall as of November 10, 2021, paid any amount of money in Alaska, Arizona, California, Colorado, Delaware, District of Columbia, Florida, Hawaii, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Maine, Massachusetts, Minnesota, Missouri, New Jersey, New Mexico, Oklahoma, Pennsylvania, Puerto Rico, Rhode Island, South Carolina, South Dakota, Virginia, Washington, West Virginia, or Wyoming for a valsartan-containing drug (intended for personal or household use) that was manufactured by any Active Pharmaceutical Ingredient or Finished Dose Manufacturer Defendant.
- b. A breach of express warranty subclass of all TPPs that, from at least January 1, 2012 through the date of final recall as of November 10, 2021, paid any amount of money in Alabama, Arkansas, Georgia, Mississippi, Montana, Nebraska, Nevada, New Hampshire, New York, North Carolina, North Dakota, Ohio, Oregon, Tennessee, Texas, Utah, Vermont, or Wisconsin for a valsartan-containing drug (intended for personal or household use) that was manufactured by any Active Pharmaceutical Ingredient or Finished Dose Manufacturer Defendant.
- c. A breach of express warranty subclass of all TPPs that, from at least January 1, 2012 through the date of final recall as of November 10, 2021, paid any amount of money in Connecticut for a valsartan-containing drug (intended for personal or household use) that was manufactured by any Active Pharmaceutical Ingredient or Finished Dose Manufacturer Defendant.

Breach of Implied Warranties of Merchantability and Fitness Subclasses

- a. A breach of implied warranty subclass of all TPPs that, from at least January 1, 2012 through the date of final recall as of November 10, 2021, paid any amount of money in Alaska, California, Colorado, Delaware, District of Columbia, Hawaii, Indiana, Maine, Massachusetts, Minnesota, Missouri, New Jersey, New Mexico, Oklahoma, Pennsylvania, Puerto Rico, Rhode Island, South Carolina, South Dakota, Virginia, or West Virginia for a valsartan-containing drug (intended for personal or household use) that was manufactured by any Active Pharmaceutical Ingredient or Finished Dose Manufacturer Defendant.
- b. A breach of implied warranty subclass of all TPPs that, from at least January 1, 2012 through the date of final recall as of November 10, 2021, paid any amount of money in Arkansas, Georgia, Maryland, Michigan, Mississippi, Montana, Nebraska, Nevada, New Hampshire, North Dakota, Texas, or Wyoming for a valsartan-containing drug (intended for personal or household use) that was manufactured by any Active Pharmaceutical Ingredient or Finished Dose Manufacturer Defendant.
- c. A breach of implied warranty subclass of all TPPs that, from at least January 1, 2012 through the date of final recall as of November 10, 2021, paid any amount of money in Arizona, Connecticut, Florida, Idaho, Illinois, Iowa, Kansas, Kentucky, New York, North Carolina, or Washington for a valsartan-containing drug (intended for personal or household use) that was manufactured by any Active Pharmaceutical Ingredient or Finished Dose Manufacturer Defendant.
- d. A breach of implied warranty subclass of all TPPs that, from at least January 1, 2012 through the date of final recall as of November 10, 2021, paid any amount of money in Alabama, Ohio, Oregon, Tennessee, Utah, or Vermont for a valsartan-containing drug (intended for personal or household use) that was manufactured by any Active Pharmaceutical Ingredient or Finished Dose Manufacturer Defendant.

Fraud Class

- a. A fraud class of all TPPs, from at least January 1, 2012 through the date of final recall as of November 10, 2021, paid any amount of money in Alaska, California, Connecticut, Delaware, Georgia, Indiana, Kansas, Kentucky, Maine, Maryland, Massachusetts, Michigan, Nebraska, New Hampshire, New Mexico, North Carolina, Ohio, Pennsylvania, South Carolina, South Dakota, Texas, Utah, West Virginia, or Wisconsin for a valsartan-containing drug (intended for personal or household use) that was manufactured by any Active Pharmaceutical Ingredient or Finished Dose Manufacturer Defendant.
- b. A fraud class of all TPPs, from at least January 1, 2012 through the date of final recall as of November 10, 2021, paid any amount of money in Alabama, Arizona, Arkansas, Hawaii, Idaho, Illinois, Minnesota, Mississippi, Missouri, Montana, Nevada, Oregon, or Tennessee for a valsartan-containing drug (intended for personal or household use) that was manufactured by any Active Pharmaceutical Ingredient or Finished Dose Manufacturer Defendant.

- c. A fraud class of all TPPs, from at least January 1, 2012 through the date of final recall as of November 10, 2021, paid any amount of money in Colorado, District of Columbia, Florida, Iowa, Louisiana, New Jersey, New York, North Dakota, Oklahoma, Rhode Island, Vermont, Virginia, Washington, Wyoming, or Puerto Rico for a valsartan-containing drug (intended for personal or household use) that was manufactured by any Active Pharmaceutical Ingredient or Finished Dose Manufacturer Defendant.

Violation of State Consumer Protection Laws Subclasses

- a. A violation of state consumer protection laws subclass of all TPPs that, from at least January 1, 2012 through the date of final recall as of November 10, 2021, paid any amount of money in Alaska, Arizona, California, Connecticut, Florida, Hawaii, Idaho, Illinois, Louisiana, Missouri, Nebraska, New Hampshire, New York, North Carolina, North Dakota, Oklahoma, Oregon, Pennsylvania, South Carolina, Tennessee, or Washington for a valsartan-containing drug that was manufactured by any Active Pharmaceutical Ingredient or Finished Dose Manufacturer Defendant.
- b. A violation of state consumer protection laws subclass of all TPPs that, from at least January 1, 2012 through the date of final recall as of November 10, 2021, paid any amount of money in Delaware or Minnesota for a valsartan-containing drug that was manufactured by any Active Pharmaceutical Ingredient or Finished Dose Manufacturer Defendant.
- c. A violation of state consumer protection laws subclass of all TPPs that, from at least January 1, 2012 through the date of final recall as of November 10, 2021, paid any amount of money in Georgia, Maine, Massachusetts, Mississippi, or Texas for a valsartan-containing drug that was manufactured by any Active Pharmaceutical Ingredient or Finished Dose Manufacturer Defendant.
- d. A violation of state consumer protection laws subclass of all TPPs that, from at least January 1, 2012 through the date of final recall as of November 10, 2021, paid any amount of money in Arkansas, Colorado, Kentucky, New Mexico, South Dakota, or Virginia for a valsartan-containing drug that was manufactured by any Active Pharmaceutical Ingredient or Finished Dose Manufacturer Defendant.

Unjust Enrichment Subclasses

- a. An unjust enrichment subclass of all TPPs that, from at least January 1, 2012 through the date of final recall as of November 10, 2021, paid any amount of money in Alabama or Montana for a valsartan-containing drug (intended for personal or household use) that was distributed or sold by any Wholesaler Defendant.
- b. An unjust enrichment subclass of all TPPs that, from at least January 1, 2012 through the date of final recall as of November 10, 2021, paid any amount of money in Texas for a valsartan-containing drug (intended for personal or household use) that was distributed or sold by any Wholesaler Defendant.

- c. An unjust enrichment subclass of all TPPs that, from at least January 1, 2012 through the date of final recall as of November 10, 2021, paid any amount of money in Alaska, Delaware, Florida, Georgia, Idaho, Nebraska, New Jersey, North Dakota, Ohio, Pennsylvania, Virginia, or Washington for a valsartan-containing drug (intended for personal or household use) that was distributed or sold by any Wholesaler Defendant.
- d. An unjust enrichment subclass of all TPPs that, from at least January 1, 2012 through the date of final recall as of November 10, 2021, paid any amount of money in Arizona, Arkansas, Connecticut, Maryland, Minnesota, Rhode Island, Vermont, or Wyoming for a valsartan-containing drug (intended for personal or household use) that was distributed or sold by any Wholesaler Defendant.
- e. An unjust enrichment subclass of all TPPs that, from at least January 1, 2012 through the date of final recall as of November 10, 2021, paid any amount of money in California, Colorado, District of Columbia, Hawaii, Illinois, Indiana, Iowa, Kansas, Louisiana, Maine, Massachusetts, Mississippi, Missouri, Nevada, New Mexico, New York, North Carolina, Oklahoma, Oregon, South Carolina, South Dakota, Tennessee, Utah, or Puerto Rico for a valsartan-containing drug (intended for personal or household use) that was distributed or sold by any Wholesaler Defendant.

Exclusions

Excluded from all of TPPs' proposed class definitions are the following: (a) Defendants and affiliated entities; (b) Defendants' assigns, and successors; (c) All federal and state governmental entities except for cities, towns, municipalities, or counties with self-funded prescription drug plans; (d) Pharmacy Benefit Managers ("PBMs"); (e) TPPs whose only valsartan-containing drug purchases, who would otherwise meet this Class Definition, were for Hetero Defendants' valsartan-containing drugs dispensed prior May 1, 2018; and (f) All third-party payors who properly execute and file a timely request for exclusion from any Court-approved class.